

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

82152

SEP 19 1984

Charles R. Hanson, Director
Memphis Environmental Center
Velsicol Chemical Corporation
2603 Corporate Ave., Suite 100
Memphis, Tennessee 38132

Re: Ventron/Velsicol
Woodridge Borough

Dear Sir:

The United States Environmental Protection Agency (EPA) intends to expend public funds to investigate the release and/or threatened release of hazardous substances at the above-referenced site. EPA also intends to spend additional public funds on any investigative and corrective measures necessary to control such release and/or threatened release. Unless EPA determines that a responsible party will properly perform such actions, EPA intends to do so pursuant to applicable provisions of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. §9601 et seq.

Under section 107(a) of CERCLA and other laws, responsible parties may be liable for any costs incurred by the government in taking corrective actions at the site. Such costs may include but need not be limited to, expenditures for investigation, planning, cleanup of the site and enforcement. By this letter, EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to undertake voluntary cleanup activities.

Responsible parties under CERCLA include current and past owners or operators and persons who generated the hazardous substances or were involved in the transport, treatment, or disposal of them. Based on state records EPA believes that you may be a responsible party. More specifically, the Agency has reason to believe that your company was the owner/operator of the facility.

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SYMBOL	SICB	SICB	ERRD-DD	ERRD	ORC		
SURNAME	CZAPOR	OGG	LUFTIG	LIBREZZI	Mugdan		
DATE	9/19/84	9/19/84	9/19/84	9/19/84	9/19/84		
EPA Form 1320-1 (12-70)					OFFICIAL FILE COPY		

EPA is aware that your company is already involved in discussions with the New Jersey Department of Environmental Protection (NJDEP) regarding this site. You are encouraged to continue this activity and to report its status in your response. If you are able to reach agreement with the NJDEP, EPA will not proceed with a publicly funded remedial investigation/feasibility study. Please be aware that the remedial investigation/feasibility study which EPA is proposing is similar in scope to that which has been discussed between your company and NJDEP.

You are hereby notified that EPA is planning to conduct the following studies at the site:

1. A remedial investigation to identify the nature and extent of the release and/or threatened release. The goals of this investigation may include:
 - a) identification of local hydrogeological characteristics to evaluate groundwater quality and movement in the vicinity of the site;
 - b) determination of the extent of soil, air and surface water contamination at the site.
2. Feasibility studies to evaluate possible remedial actions to remove or contain hazardous substances at the site.

In addition to the above studies, corrective measures may be necessary to protect public health, welfare or the environment. These corrective measures may include, but need not be limited to:

1. Implementation of initial remedial measures, e.g., securing the site to prevent contact with any hazardous or toxic substances, and/or removal of contaminated material from the surface;
2. Design and implementation of the EPA approved remedial option for addressing any groundwater, surface water, soil and air contamination;
3. Any monitoring and maintenance necessary after remedial measures have been completed.

You should notify EPA in writing no later than September 26, 1984 as to whether you have reached agreement with the State of New Jersey and the extent of the above-mentioned studies and corrective measures you may be willing to undertake.

Otherwise, EPA will assume that you decline to voluntarily undertake any such studies or corrective measures, and the Agency may proceed with them as it deems necessary. Your written response should identify your representative for further contact regarding this matter by name, address and telephone number.

Your letter of response should be sent to:

John V. Czapor
Site Investigation and Compliance Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

If you need further information, you can reach Mr. Czapor by telephone at 212-264-1573.

Sincerely yours,

William J. Librizzi, Director
Emergency and Remedial Response Division

cc: Jorge Berkowitz, NJDEP ✓
Gerald Burke, NJDEP
Ronald Heksch, NJDAG

bcc: Walter Mugdan